

Session 1 – ARRA Contract & Program Guidance  
WEBINAR QUESTIONS and ANSWERS  
September 10, 2009

**Budget**

**Q: Please define Administrative expenses versus Programmatic expenses.**

*A: The costs of administration are that allocable portion of necessary and allowable costs that are associated with the overall management and administration of the CSBG ARRA and are not related to the direct provision of ARRA activities. These costs can be both personnel and non-personnel and both direct and indirect. For example: Accounting, financial, cash management, budget activities, procurement, personnel, payroll, property management, and audits. The costs of supplies and equipment used for administrative functions or activities and the cost of staff that perform and/or supervise administrative functions or activities are considered administrative costs.*

*Direct program costs can be specifically identified with delivery of a particular project, service, or activity undertaken by a grantee to achieve an outcome intended by the funding program. Direct program costs are incurred for the service delivery and management components within a particular program or project. Therefore, direct program costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts that expressly relate to the delivery of an individual program or service funded by a specific grant source.*

**Client Eligibility**

**Q: Are there specific documents we need to collect from clients to document they meet the 200% of the federal poverty level (FPL)?**

*A: Documentation should be collected that substantiates the client income meets the poverty guideline, but there is no “specific” documentation identified. Examples of documentation include but are not limited to: pay stubs, unemployment compensation statements, income tax statements, SSI or government income, and photocopies of child support checks. It is essential copies of the income documentation are maintained in each client file that substantiates eligibility to receive services.*

**Q: Are the regular CSBG contracts going to be amended to include to 200% FPL guidelines?**

*A: Yes, the 200% FPL guideline for the regular CSBG contracts is authorized for the term of July 1, 2009 through September 30, 2010. On October 1, 2010 the CSBG poverty guidelines defaults back to 100% of the federal poverty line.*

**Q: Our existing CSBG contract still references only 100% Federal Poverty Limits. Will there be a modification issued to adjust to the 200% for our regular CSBG contract?**

*A: Yes, CSD will process an amendment that formally increases the poverty level to 200% for the term of July 1, 2009 through September 30, 2010.*

**Q: We are getting pressure to serve people who may have earned \$60,000 until they were laid off 2 months ago. They insist that they had "0" earned last month and meet the monthly 200% guidelines. We try to tell them it must be annual family income - but I cannot find "annual" written anywhere.**

*A: The purposes of the American Recovery and Reinvestment Act include: 1) To preserve and create jobs and promote economic recovery and (2) To assist those most impacted by the recession. There is no annual income requirement. If individuals previously earned \$60,000 per year, but now have zero income due to the loss of their income, they are eligible to receive services and would fit into the category of assisting those most impacted by the recession.*

### **Jobs**

**Q: Just clarification- Is training of instructors (who will train students in a classroom) are permitted?**

*A: Yes*

**Q: Am I correct in assuming that the jobs created is only jobs for which CSBG ARRA funds pay the salary. It does not include jobs opportunities created through job development programs.**

*A: Yes, that is correct. Jobs or positions created mean those new positions created and filled, or previously existing and retained, as a result of Recovery Act funding directly supporting the wages and benefits.*

**Q: If part of a weatherization training program includes observation (field trips) to actual work sites, to observe the WX process, but perform no actual labor or construction work, is this going to be an issue?**

*A: As long as there is no work performed by the students, this activity will not be disallowed.*

**Q: If we are not sure if we have a "labor or construction" employment program - can we send to you for pre-approval or denial ASAP? We need to know what to put in our contract.**

*A: In CSBG ARRA Guidance No. 004, dated August 25, 2009, you will find the guidelines for labor and labor-related projects. If there is a question if your project or program is "labor" related you can submit it to CSD. Our goal would be to get back with you in just a few business days.*

**Q: How do you define labor? Does this mean we cannot use CSBG-ARRA for any type of subsidized employment? In the example of allowable costs, it includes wages, benefits, or stipends for persons to conduct outreach and energy audits.**

*A: In CSBG ARRA Guidance No. 004, you will find much of this addressed. "Labor" is defined in the federal Davis Bacon Act (DBA). The law authorizing all ARRA funding requires any labor or construction funded by ARRA—including CSBG ARRA—to be paid according to the prevailing wage requirements of the DBA. Therefore, CSD is prohibiting the use of CSBG ARRA funds for any wages supporting labor or construction as defined by DBA, because the CSBG ARRA funds do not include State administrative funds to enable the State to ensure compliance with federal prevailing wage requirements. CSBG ARRA funds may be used for wages, benefits or stipends for persons to conduct outreach or energy audits or other work for weatherization programs that is not considered labor or construction.*

**Q: Is there guidance on the number of jobs to be created with a certain amount of funding, or any average that is expected?**

*A: There is no specific guidance on the number of jobs. Agencies should consider the funding received and what is reasonable based on the level of funding, specific program and activities associated with creating a job.*

### **Non Competitive Bid – Cal Neva**

**Q: How or in what format do I appeal to CSD for an exemption to do a bid for our Education and Outreach Project? All 21 of our participant agencies are asking the same question. We will be a sub-contractor to them for the project and I would like to be approved as a sole source.**

Due to the unique expertise, leadership and capacity of Cal/Neva to significantly advance the ability for local CSBG providers to reach families who are eligible for CSBG services, CSD approves of its subrecipients subcontracting with Cal Neva to support the Fulfill the Promise statewide campaign. Subrecipients do not need to individually apply to CSD for a non-competitive bid for this particular project. Instead, CSD will accept a written project proposal from Cal Neva, including detailed budget, describing the objective, timeline, tasks, key personnel, and the total costs of the project. Please include a budget narrative that explains how the costs will be allocated among the 21 participant agencies. If there are any anticipated costs that are not allowable under CSBG ARRA, please itemize them and identify the source of funds for those costs. If Cal Neva is further subcontracting with vendors or consultants to complete the project, please submit copies of those subcontracts directly to CSD, and include all relevant accountability and transparency requirements in those subcontracts. Lastly, please keep in mind the ARRA-specific limitations on administrative costs; any administrative costs incurred by Cal Neva or your subcontractors should be accounted for and kept to a minimum, as those costs will impact the

administrative cost budget of each of the 21 participants. CSD will coordinate directly with Cal Neva to conduct monitoring, audit and risk management reviews of the Fulfill the Promise subcontract as required by ARRA, to alleviate the need for 21 CSBG recipients from performing that monitoring individually.

### **Procurement**

**Q: Please clarify if purchases of supplies totaling more than \$500 require CSD approval.**

*A: No, the purchase of supplies does not require preapproval from CSD.*

**Q: Just for clarification on what applies to agencies applies to subcontractors are we required to get CSD pre-approval for subcontractors' durable goods that exceed \$500?**

*A: You are correct that what applies to agencies is applicable to subcontractors. However, pre-approval from CSD is not required. Your subcontractor would need to get your pre-approval.*

**Q: Please define "Durable goods".**

*A: In the economic or financial context, durable goods are generally considered to be ones that have a useful life of three or more years. CSD will amend CSBG ARRA Guidance No. 00X to include this language*

**Q: Does the competitive bid requirement apply to the purchase durable goods over \$500? It does not state this in the transmittal, page 2 of transmittal 001.**

*A: Yes, the competitive bid requirement applies. OMB regulations require that all procurement of goods and services—for ANY dollar amount—must be open and fair.*

### **Separate Tracking/Accounting**

**Q: Can you please discuss the "separate tracking/accounting" provisions as it relates to an agency that utilizes an indirect cost pooling system?**

*A. Agencies are required to have an accounting system that can uniquely identify a contract or program. So, CSBG ARRA should have its own accounting code to separately track expenses charged to the CSBG ARRA contract from other contracts.*

*Any indirect cost pool is charged expenses that do not benefit any one program, but several or all programs. Indirect cost pools are allocated to benefiting program based on some data that best achieves a fair share allocation. Most accounting systems have a sub element, subprogram, or other code that uniquely identifies detailed expenditures or indirect costs.*

### **Subcontractor**

**Q: Can we add ARRA funds to existing contracts without open bid?**

*A: If agencies have followed their internal processes which meet the usual requirements of OMB “open and fair” procurement rules to select their current subcontractors, and elect to allocate additional CSBG ARRA funding to each of those subcontractors to expand their current services, they are not required to go out to bid again. However, the agency must be able to provide verification that the subcontractors were selected according to their internal processes and substantiate the rationale for augmenting these subcontracts. The ARRA funds must be accounted for separately.*

**Q: Does the 12% allocated for grantee administration include administrative dollars for subcontractor subcontractors?**

*A: The 12% Administration is based on the entire CSBG ARRA allocation. For example, if the Eligible Entity receives a \$100,000 CSBG ARRA allocation the maximum Administration cost cannot exceed \$12,000. How you divide the \$12,000 between subcontractors and their subcontractors is between you agency and the subcontractors. Just keep in mind Administration cannot exceed 12% of the total allocation.*

**MORE INFORMATION:**

<http://www.csd.ca.gov/documents/Recovery%20Tab/CSD%20ARRA%20Guidance/CSBG%20ARRA%20Program%20Guidance%20002.pdf>

**Q: Are subcontractors required to have a DUNS number?**

*A: Yes, every organization who receives ARRA funds is required to have a DUNS number and a CCR number*

**Q: Will you provide a sample monitoring tool for subcontractors?**

*No, CSD has not developed a sample tool to monitor subcontractors. Agencies may want to contact their peers for a model tool. If agencies have an effective sample tool you can submit to CSD and we can post on our website for the network.*

**Q: When will the subcontractor contract be made available?**

*A: The template for the CSBG ARRA contract is available on CSD’s website at <http://www.csd.ca.gov/Contractors/CSBG/Contract%20Template's.aspx?PageView=Shared> This contract can be modified for use as a subcontractor agreement.*

**Q: If subcontractors are approved by CSD as sole source, where is the amount entered on the budget planning forms?**

*A: Insert the amount for administrative subcontractor services on the CSBG ARRA Contract Budget Summary, 902.S. Section 10, Line Item 6. and program costs subcontractor services in Section 20, Line Item 6 and explained and justified on the CSBG ARRA Budget Support – Non Personnel Costs, CSD 902.1.2, Section 10, Line item 6 and Section 20, Line item 6.*

**Q: Can we use current contractors that were secured under a sole-source basis.**

*A: Please refer to CSBG ARRA Contract, page A5 to ensure the current sole source contract meets the justification.*

### **Loan and Grant Programs**

**Q: Where can we obtain a listing of the many documents required for loan and grant programs?**

*A: All the documents that you are required to CSD can be found listed in Transmittal 004, dated August 25, 2009. This document can be obtained at <http://www.csd.ca.gov/documents/Recovery%20Tab/CSD%20ARRA%20Guidance/CSBG%20ARRA%20Program%20Guidance%20004.pdf>*

### **Reporting**

**Q: Can we submit July and August expenses in our September report?**

*A: No. Expenses need to be billed in the month they occurred. You will need to enter the expenses in the appropriate month in EARS.*

**Q: I understand we do not combine stats (we will submit two forms 1 ARRA and one CSBG), but will the "901" also be used in the 2010 contract for regular CSBG, or are we going to have two different forms for that year?**

*A: The forms in the CSBG ARRA are unique to the ARRA contract. The same forms will not be used for the regular CSBG.*

**Q: Should the updated information for the Local Plan be incorporated into the Work Plans or should we update the Local Plan in addition to filling out the work plan?**

*A: Any changes made to your local plan for ARRA should be reflected in your CSBG ARRA contract.*

**Q: Our local plan included "activities that provide minor home repair and modification for elderly persons to enable them live safely in their residence". Prohibited via program guidance?**

*A: It appears from the description these activities would be prohibited. However, you can contact CSD to discuss the specific details and activities as some activities may be allowable.*

**Q: The OMB Reporting Guidance and the NPI Reporting Guidance do not appear to match. Is it reporting only on jobs funded with ARRA or also those leveraged with ARRA?**

*A: The OMB reporting (CAAT DATA CALLS) agencies report only on jobs funded with ARRA. The NPI reporting will capture those jobs leveraged.*

**Q: What happens if a "guidance" comes in after the contract begins and we have not collected the new data or may have undertaken an activity that becomes unallowed after the fact?**

*A: If there is new guidance issued you will need to follow that new guidance based on the effective date. So far, guidance has not been issued that is retroactive. If guidance is issued that identifies a previous activity as unallowable that previously was allowed CSD would work with the individual agencies. CSD understands that if you were not aware of the guidance you would not have been able to collect the data and/or were operating your program under good faith.*

### **Resolution**

**Q: Is there anything unique to the ARRA board resolution that is not included in regular CSBG resolution?**

*A: The CSBG ARRA Board Resolution needs to be specific to the CSBG ARRA contract.*

### **Risk Assessment**

**Q: Do you have a sample risk assessment?**

*A: OCS has forwarded a risk assessment documents to the States for the CSBG eligible entities to complete. As a reminder it is due to CSD by **October 15, 2009** and CSD is required to submit to OCS by October 30, 2009. The risk assessment template and applicable documents can be located on CSD's website at the following:*

### **Risk Assessment Assurance Template**

<http://www.csd.ca.gov/Contractors/documents/CSBG%20tab/Recovery%20Act/IM%20112%20Certification%20form%20only.doc>

### **Risk Assessment Presentation (conducted by OCS for the States)**

[http://www.csd.ca.gov/Contractors/documents/CSBG%20tab/Recovery%20Act/Risk%20Assessment%20presentation\\_OCS%209%2009%2009.pdf](http://www.csd.ca.gov/Contractors/documents/CSBG%20tab/Recovery%20Act/Risk%20Assessment%20presentation_OCS%209%2009%2009.pdf)

### **ARRA Risk Mitigation, Information Memorandum, OCS Transmittal No. 112**

[http://www.csd.ca.gov/Contractors/documents/CSBG%20tab/Recovery%20Act/ARRA%20Risk%20Mitigation%20CSBG%20IM%20112%20doc\\_081809.doc](http://www.csd.ca.gov/Contractors/documents/CSBG%20tab/Recovery%20Act/ARRA%20Risk%20Mitigation%20CSBG%20IM%20112%20doc_081809.doc)

### **Miscellaneous**

**Q: Will our field rep be the same person for the CSBG/ARRA contract as with CSBG? Can you send out a list of field reps?**

*A: The assignments for Diamond Longjel and Sylmia Britt are not changed. CSD is in the process of hiring two new Field Representatives and the list will be updated and distributed once the positions are filled.*

**Q: How do we subscribe to the blog? When you say blog, you mean CSD train tracks?**

*A: Go to <http://csdtraintracks.blogspot.com>. On the right you will see an area titled "Subscribe via email." Simply enter your email address and click "subscribe." When you do this, you will start getting emails about any new posts we place on the blog.*

**Q: I'm on the Train Tracks blog, but I cannot find the Transmittal 001. Is the transmittal posted there?**

*A: No, but you can find the Transmittals at this address:  
<http://www.csd.ca.gov/Recovery/CSBG%20ARRA%20Guidance.aspx?PageView=Shared>*

**Q: Can you talk about SEFA?**

*A: SEFA is the acronym for Schedule of Expenditures of Federal Awards. The SEFA is contained in your agency's A-133 audit. It contains a list of grantors, pass through agencies, pass through grantors, award number and expenditures.  
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**Q: You have a problem with the RSS subscription feature of your site, it does not notify when you post to "sub-pages" - it only notifies us when you post to main page. You post new stuff and the RSS does not notify us.**

*A: The RSS only notifies with posts are made to the main pages. There is not a function on the RSS subscription to subscribe to the numerous sub-pages.*



**WEBINAR QUESTIONS**  
**Session 2 – CSBG ARRA Documents**  
**September 10, 2009**

**Q: What if a project can be captured under more than one NPI. How is this reported on CSD 923?**

*A: You only need to report one NPI on the CSD 923 for each project. The full extent of the goals that are achieved through the administration of a project will be captured on the CSD 901 (NPI).*

**Q: If sub contractors are approved by CSD as sole source, where is the amount entered on the budget planning forms?**

*A: Regardless if the subcontract is achieved by sole source (NCB) or competitive solicitation the agency will enter the cost of the subcontractor on the CSD 902.2, 902.1.1, 902.1.2, 920, and 923. Please see the instructions for what line item the subcontractor cost should be entered.*

**Q: DOL, in conjunction with OMB, does not consider "summer youth" programs to be job placements for ARRA purposes, they are work experience training opportunities, does CSD want us to use different criteria for CSBG "jobs created", by counting Summer Youth job opportunities as "jobs created"**

*A: Under CSBG the jobs can be counted using the criteria for jobs created and retained.*

**Q: Will we be allowed to modify projections on the 901?**

*A: The projections will not be allowed to be modified. This is due to the fact that the projections are only supposed to be estimates based upon an assessment of potential enrollment and outcomes.*

**Q: Do "direct placements" count as a "job created or filled" (i.e., we used ARRA funds for a job development specialist to find, refer, and track an unemployed person, but we did not pay the person with ARRA funds, rather we paid for the placement activities. Is that a job created?)**

*A: No, jobs or positions created mean those new positions created and filled, or previously existing filled that are retained as a result of Recovery Act funding.*

**Q: Will CSBG ARRA require that families be reported as 1 client and not individuals?**

*A: Families will still need to be counted by the individuals being served. Individual and families are counted on the CSBG ARRA Client Characteristics Report (CSD 903 CCR).*

**Q: What is the recommended practice to allocate admin funds to the different NPI categories in form CSD 923?**

*A: Administrative funds can be allocated across projects reported on the CSD 923 or by a percentage of administrative staff time used to work on each project. The method to be utilized is determined by each agency.*

**Q: Is there a specific format for the budget narrative? If so, is this available on the website?**

*A: The budget narrative should detail each expenditure and be a complete description on how the funds will be utilized. No template has been set out, but some agencies have used the format of the CSD 902.S and added narratives to each line item.*

**Q: Are there specific definitions for subcontractor administrator costs?**

*A: A subcontractor's administrative costs are the same as all of the recipient agencies. Please see the instructions included with the budget documents (CSD 902 series) for explanations of administrative costs.*

**Q: If a fixed fee is paid to a subcontractor, does there still have to be an administrative cost?**

*A: Administrative fees allocated to a subcontractor are optional. Eligible entities are not required to allocate an administrative cost to subcontractors.*

**Q: Can we claim for personnel cost, after July 1 but before the project with the subcontractors is implemented?**

*A: Costs may be claimed for expenditures incurred from July 1 to the end of the term of the contract. Expenditures should not be claimed if no costs have been billed or paid.*

**Q: I was confused with the 902.S regarding the other agency funds used to support ARRA project. Did it mean only non-ARRA funds used for the particular ARRA project or agency-wide non-ARRA funding?**

*A: In Section 80 of the CSD 902.S you are to report other agency operating funds used to support CSBG ARRA projects and activities.*

**Q: Does completing budget form 902.1.2 fulfill the requirement for a budget narrative noted in the contract in Exhibit-B, page ARRA-B1, section 1, and subsection b?**

*A: Completing this form does not fulfill the budget narrative requirement, as the contract dictates that a budget narrative is required for both personnel and non-personnel costs.*

**Q: Our CAA is a sub-unit within an agency of county government. Are other agencies within our county government considered subcontractors**

**for the purpose of ARRA if they are executing program functions under our ARRA contract?**

*A: Yes, if you are contracting with the agencies to administer the ARRA Program they are considered sub-contractors.*

**Q: If project has more than one service category do we submit a 920 for each service category or one for the project?**

*A: It is not necessary to submit a separate CSD 920 if a project has multiple service categories. Simply select one service category for each project reported on a CSD 920.*

**Q: What about updating Local Area Plans. Should we update them if we are changing our plan? If so, do we update our plan by working on the Work Plans or should we have an updated plan and the work plans**

*A: There is not need to update the CSBG Recovery Act Local Plans. Instead, institute any changes in the work plans you are submitting with the CSBG ARRA contracts.*

**Q: For the work plans, are those number of jobs created or retained in FTE?**

*A: The jobs calculated need to be calculated based on FTE.*

**Q: If the RFP process will not be completed by the due date for submitting the 920/923/901 forms what are the guidelines for filling out the forms absent this critical information?**

*A: The CSD 920, 923 and 901 do not require the subcontractor's information, just the project information. If you have already begun the RFP process then you are aware of the project cost, description and outcomes. This will be the information that is needed for the submission of these forms.*

**Q: When you said to submit within 30 days of contract execution were you referring to the execution of the subcontract?**

*A: Subcontractor information is required to be submitted within 30 days of execution of the subcontract.*

**Q: Publicity is an ARRA outcome. Would a subcontract with Cal Neva be an administrative cost or a program cost?**

*A: The Cal-Neva "Fulfilling the Promise" project is considered a program costs due to the fact that the services go towards disseminating programmatic information. However, if Cal-Neva or any of its subcontractors use some of the funds for costs that are considered administrative, those costs would need to be appropriately budgeted and charged.*

**Q: Does report form CSD 902.S need to be filled out: 1 form per project?**

*A: The CSD 902.S is a cumulative form for the entire contract. Only one form needs to be submitted capturing all the expenditures for the CSBG ARRA contract.*